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APPLICATION OF SOUTHWESTERN)	BEFORE THE PUBLIC UTILITY
ELECTRIC POWER COMPANY FOR)	COMMISSION OF TEXAS
AUTHORITY TO RECONSTRUCT)	
COSTS)	REFERRED TO THE STATE OFFICE
)	OF ADMINISTRATIVE HEARINGS

SIERRA CLUB'S RESPONSE TO
SOUTHWESTERN ELECTRIC POWER COMPANY'S
FIRST REQUEST FOR INFORMATION TO SIERRA CLUB

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**SIERRA CLUB'S RESPONSE TO
SOUTHWESTERN ELECTRIC POWER COMPANY'S
FIRST REQUEST FOR INFORMATION TO SIERRA CLUB**

Sierra Club hereby provides its responses and objections to Southwestern Electric Power Company's ("SWEPCO" or the "Company") First Request for Information ("RFI") to Sierra Club.

I. GENERAL OBJECTIONS & RESPONSES

Sierra Club objects to the instructions and directions in SWEPCO's First Request for Information insofar as they seek: (A) to impose more burdensome requirements for discovery than the applicable requirements of 16 Texas Administrative Code ("TAC") Chapter 22, the Texas Rules of Civil Procedure, the Texas Administrative Procedure Act, Tex. Gov't Code Ann. Chapter 2001, or Commission precedent; or (B) require disclosure of privileged communications and information pursuant to the attorney-client privilege or disclosure of communications and information protected from discovery under the attorney work product doctrine. Subject to and without waiving these general objections, Sierra Club responds to SWEPCO's First Request for Information to Sierra Club, expressly reserving all evidentiary and other objections concerning Sierra Club's responses and any related documents that SWEPCO may seek to offer into

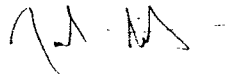
evidence in this case. Sierra Club's responses are made in the spirit of cooperation without waiving Sierra Club's right to contest the admissibility of any of these matters at hearing. When Sierra Club provides certain information sought by the request while objecting to the provision of other information, it does so without prejudice to its objection in the interests of narrowing discovery disputes under 16 TAC § 22.144(d)(5). Pursuant to 16 TAC § 22.144(c)(2)(F), Sierra Club stipulates that its responses may be treated by all parties as if they were made under oath.

II. SPECIFIC RESPONSES

Sierra Club's written responses to SWEPCO's First Request for Information are attached and incorporated by reference. Each response is stated on or attached to a separate page on which the request has been restated. In accordance with 16 TAC § 22.144(c)(2)(A), each response lists the preparer or person under whose direct supervision the response was prepared and any sponsoring witness.

Dated: April 8, 2021

Respectfully submitted,

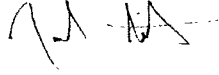


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Counsel for Sierra Club

CERTIFICATE OF SERVICE

I, Joshua Smith, certify that a copy of the foregoing Sierra Club submission was served upon all parties of record in this proceeding on April 21, 2021, by First-class U.S. mail, hand delivery, and/or e-mail, as permitted by the presiding officer.



Joshua Smith
Sierra Club

RESPONSES

Question No. SWEPCO-Sierra Club 1-1:

Refer to the following sentence on page 13, line 16 of Devi Glick's direct testimony: "These are low capacity factors for plants with such high fixed costs." Please provide all reports used to compare the average capacity factors and fixed costs of generating units. Please indicate all specific generating units/plants/facilities that were compared to the Welsh and Flint Creek units.

Response:

In offering this opinion, Ms. Glick relied primarily on her general knowledge of the industry, and the fact that coal-burning plants have relatively high fixed costs, including labor, compared to other generation resources. In addition, see *U.S. EIA, Generating Unit Annual Capital and Life Extension Costs Analysis, December 2019*. Available at https://www.eia.gov/analysis/studies/powerplants/generationcost/pdf/full_report.pdf. The units reviewed are listed in the report.

Preparer: Devi Glick, with assistance of counsel

Sponsor: Devi Glick

Question No. SWEPCO-Sierra Club 1-2:

Refer to the paragraph beginning on page 18, line 1 of Devi Glick's direct testimony. "I add the capital expenditure costs to the fuel and O&M costs to get total unit costs." Please identify and provide all testimonies in which Ms. Glick has included capital expenditures in her calculation of total unit costs.

Response:

This analysis has not been completed. See Exhibit 1, the Resume of Devi Glick, for a complete list of all dockets where Ms. Glick has filed testimony.

Preparer: Devi Glick, with assistance of counsel

Sponsor: Devi Glick